

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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In re:)	Chapter 11
)	
FREEDOM OIL & GAS, INC., <i>et al.</i> ¹)	Under Case No. 20-32582
)	
Debtors.)	(Joint Administration Requested)
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ENTRY OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE of the appearance of the undersigned attorney, as counsel for Sendero Resources, LLC d/b/a Orednes, LLC ("Sendero"), in the above-captioned cases, and pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002, 9007, and 9010, it is requested that copies of all notices and pleadings in these cases be given to, and served upon, the following:

Kyler K. Burgi
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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders,

¹ The debtors and debtors in possession these chapter 11 cases, along with the last four digits of their respective Employer Identification Numbers, are as follows: Freedom Oil & Gas, Inc. (7422); Freedom Production, Inc. (8436); Freedom Oil & Gas USA, Inc. (3613); Freedom Eagle Ford, Inc. (8334); Maverick Drilling Company (5342); and Maverick Production Company, Inc. (1366). The Debtors' service address is: 5151 San Felipe, Suite 800, Houston, Texas 77056.

applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in these cases.

This appearance and request for service shall not be deemed or construed to be a waiver or consent by Sendero to the jurisdiction of the Bankruptcy Court or venue in the Southern District of Texas, nor, specifically, but not limited to, waiver of (i) Sendero's rights to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) Sendero's rights to a trial by jury in any proceedings so triable herein, or in any case, controversy or proceeding related hereto; (iii) Sendero's rights to have reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, set-offs, or recoupments to which Sendero is or may be entitled under any agreement, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments to Sendero are expressly reserved.

Dated: May 13, 2020

Respectfully submitted,

DAVIS GRAHAM & STUBBS LLP

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*Counsel for Sendero Resources, LLC d/b/a
Orednes, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 13, 2020, a true and correct copy of the foregoing was served by electronic means as listed on the Court's ECF noticing system.

s/ *Kyler K. Burgi*
Kyler K. Burgi